

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**PROPOSED AMENDED RULE 67.21 – ADHESIVE MATERIAL
APPLICATION OPERATIONS**

WORKSHOP REPORT

A workshop notice was mailed to all companies and government agencies in San Diego County that may be subject to the proposed amended Rule 67.21 - Adhesive Material Application Operations. Notices were also mailed to all Economic Development Corporations and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on November 5, 2007, and was attended by three people. The comments and District responses are provided below:

1. WORKSHOP COMMENT:

The proposed amendments now exempt aerosol adhesive materials from the majority of Rule 67.21 provisions including Section (f), Recordkeeping. Will facilities still be required to maintain records of aerosol adhesive materials for purposes of the Annual Emission Inventory?

DISTRICT RESPONSE:

Yes. While a prohibitory rule may have an exemption from recordkeeping requirements, facilities may still need to keep records for other reasons (e.g., to comply with New Source Review rules or Annual Emissions Inventory submittals). A facility should always follow the conditions related to recordkeeping as specified in the Permit to Operate.

2. WORKSHOP COMMENT:

Subsection (d)(1)(ii), Specialty Adhesive Materials, specifies a VOC limit for the Contact Adhesives – Special category to be 250 g/L. The facilities that install upholstery top and trim in motor vehicles and boats have been having a difficult time finding compliant adhesives that work adequately. The District should consider increasing the VOC limit for the top and trim adhesives.

DISTRICT RESPONSE:

The District agrees. A new Top and Trim Adhesive category with a VOC limit of 540 g/L has been added to the list of Specialty Adhesive Materials. There are a number of compliant products that will work well for this application. A new definition of Top and Trim Adhesive has also been added.

3. WORKSHOP COMMENT:

Subsection (d)(1)(iii), Substrate Specific Adhesives, provides new VOC limits for fiberglass at 80 g/L and for porous material at 50 g/L. For a facility that performs pipe lagging (pipe insulation) operations, which of the two VOC limits would apply?

DISTRICT RESPONSE:

In general, when two different substrates are being bonded together and the VOC limits for each of the adhesives differ, the highest applicable substrate-specific VOC limit would apply. For example, wrapping “adhesive” cloth around a fiberglass pipe is essentially bonding a porous material (50 g/L VOC limit) to fiberglass (80 g/L VOC limit), and therefore the highest VOC limit for the adhesive would be 80 g/L. Similarly, wrapping an “adhesive” cloth around a metal pipe is essentially bonding a porous material (50 g/L VOC limit) to metal (30 g/L VOC limit), in which case the highest VOC limit for the adhesive would be 50 g/L.

4. ARB COMMENTS:

There were no comments from ARB.

RR:NY:AD:jl
01/15/08